

SWANA California Chapters Legislative Task Force

2026 Legislative & Regulatory Platform and Work Plan

This Work Plan provides an overview of the Legislative Task Force's (LTF) work on behalf of the SWANA California Chapters. It summarizes key advocacy activities and accomplishments from 2025 and outlines the LTF's legislative and regulatory priorities for 2026. The document is intended to support SWANA members, local governments, partner organizations, and other stakeholders by presenting a clear picture of the issues affecting the solid waste and recycling sector and the actions the LTF will take in the year ahead.



Message from the Chair

Hello SWANA California Chapters, Members, and Colleagues,

I am pleased to present our 2026 Legislative and Regulatory Platform and share highlights from our collective work in 2025. As we enter a new year, it's a natural moment to reflect on the progress we've made and to reconnect with the priorities that matter most to us as professionals and as people. Our field grows more complex every year, and yet, the dedication of the LTF members continues to be inspiring. Balancing professional pressures and personal commitments isn't easy, and I appreciate the time, expertise, and passion that each Director brings to this effort.

In both November 2025 and March 2026, the LTF met in person to review the past year and plan for the future. These meetings were not just about producing this document—they were an opportunity to build relationships, welcome new Directors, and candidly discuss the evolving role of the LTF, including our transition to formal 501(c)(4) status. The incorporation process has been more complex and time-consuming than expected, and it has contributed to delays in finalizing this Work Plan. Even so, I am grateful for the perseverance and professionalism of everyone involved.

Looking back, 2025 brought meaningful achievements. We supported several beneficial bills impacting topics such as metal theft, biomethane, PFAS, plastics policy, and SB 1383 implementation. We invested considerable time and effort into AB 28, addressing subsurface temperature monitoring at landfills—an issue that will continue into 2026. Regulatory work was equally active, especially as the SB 54 rulemaking process intensified. Multiple rounds of revisions required rapid, detailed responses to ensure local program feasibility, defend reasonable compliance expectations, and highlight the need for adequate funding.

As we look ahead to 2026, we know the pace of legislation and regulation will not slow. The LTF is prepared to continue its role as a trusted, informed voice for local governments and the solid waste industry. We will monitor, interpret, and respond to new proposals while keeping the SWANA membership informed.

This is my second year serving as Chair, and I am honored to continue working with such a knowledgeable and committed team. The LTF remains dedicated to advancing sound, sustainable solid waste and recycling policies for California. We welcome your feedback and engagement, and we are here to support the Chapters and their members however we can.

Sincerely,

Curtis Larkin

Chair, SWANA California Chapters Legislative Task Force

Table of Contents

Message from the Chair.....2

Table of Contents 3

2025 LTF Officers and Directors: 4

SECTION 1. Executive Summary 5

SECTION 2. Mission of the SWANA California Chapters Legislative Task Force 7

SECTION 4. 2025 Review & 2026 Outlook..... 10

SECTION 5. 2026 Work Plan.....21

SECTION 6. Communication and Member Engagement 24

SECTION 7. Annual Reporting and Documentation 24

APPENDIX A. LTF Advocacy Principles 25

APPENDIX B. Acronym List.....27

APPENDIX C. 2025 Legislative Priority Bill List 28

2025 LTF Officers and Directors:

The following LTF officers and members were honored to serve the SWANA California Chapters in 2025 and contribute to this report:

Elected Officers

Curtis Larkin, Fresno County, Chair
Sharon Green, Los Angeles County Sanitation Districts, Vice Chair
Frank Caponi, P.E., Retired, Treasurer
Deepti Jain, City of Sunnyvale, Secretary

Directors

GOLD RUSH CHAPTER:

Doug Kobold, California Product Stewardship Council
Christina Hanson, Placer County/Western Placer Waste Management Authority
Larry Sweetser, Sweetser & Associates, Inc./ESJPA
Deepti Jain, City of Sunnyvale
Joe La Mariana, South Bayside Waste Management Authority

SIERRA CHAPTER:

Curtis Larkin, Fresno County
Dawyne Balch, City of Clovis
Monique Gama, City of Merced
Tari Heslop, City of Santa Maria
Mike Schlessinger, City of Merced

FOUNDING CHAPTER:

Jim Marchese, City of Los Angeles, Sanitation and Environment
Sharon Green, Los Angeles County Sanitation Districts
Mike Mohajer, P.E., So. California Waste Management Forum
Jane-Marie Fajardo, City of San Diego
Frank Caponi, P.E., Retired

LEGISLATIVE ADVOCATE

Dylan Hoffman, Shaw Yoder Antwih Schmelzer & Lange

Honorable Mentions: Lynnda Martin, Parveen Sandhu, and Tim Flanagan who served a partial year in 2025.



SECTION 1 — EXECUTIVE SUMMARY

The SWANA California Chapters Legislative Task Force (LTF) is pleased to present its 2026 Legislative & Regulatory Platform. This document summarizes the LTF's key advocacy work in 2025 and identifies priority issues that will shape legislative and regulatory engagement in 2026. The LTF represents hundreds of solid waste and recycling professionals across the state, serving as a technical resource, policy advocate, and liaison between local governments and state decision-makers.

2025: Key Legislative and Regulatory Engagement

Throughout 2025, the LTF monitored more than 60 bills affecting solid waste, recycling, and environmental policy and took positions on a significant subset of those proposals.

Major areas of engagement included:

- **Plastic pollution and EPR implementation** — Multiple rounds of SB 54 regulatory revisions required rapid review and detailed comments to ensure clarity on local jurisdiction obligations, funding requirements, alternative collection pathways, and practical enforcement timelines.
- **SB 1383 organic waste diversion** — Continued focus on implementation challenges, procurement targets, and infrastructure development, including advocacy on bills offering additional flexibility for jurisdictions.
- **Special waste streams** — Engagement on battery recycling, marine flares, compressed gas cylinders, solar panels, and other difficult-to-manage materials, many of which will continue into 2026 as two-year bills.
- **Climate and air quality regulations** — Ongoing coordination with state agencies on landfill methane regulations, emissions reporting, vehicle electrification mandates (including CARB's Advanced Clean Fleets regulation), and programs affecting solid waste facilities.

These efforts underscore the LTF's role in addressing many issues affecting landfill operations, collection services, recycling markets, infrastructure investments, and regulatory compliance.

2026: Emerging Issues and Priority Focus

In 2026, the LTF expects the regulatory and legislative landscape to remain active and complex. Core issue areas for the coming year include:

- **Single-use plastics and SB 54 implementation** – With final SB 54 regulations becoming effective in 2026, the LTF will shift into monitoring implementation, reviewing producer

responsibility plans, and advocating for robust funding mechanisms to ensure local jurisdictions are made financially whole.

- **Organics management and SB 1383 compliance** – Jurisdictions continue to face cost, infrastructure, and compliance challenges. The LTF will advocate for reasonable enforcement, expanded procurement options, and state funding to support program development.
- **Extended Producer Responsibility (EPR)** – Multiple EPR frameworks—covering materials such as solar panels, carpet, household hazardous waste, batteries, and other emerging product categories—will likely advance. The LTF will support approaches that shift end-of-life management costs from local governments to producers while ensuring practical implementation.
- **Climate policy and emission regulations** – Updates to the Landfill Methane Regulation, continued rollout of the Advanced Clean Fleets mandate, and other CARB initiatives will significantly affect fleet operations and facility compliance. The LTF will advocate for policies that recognize the operational realities of essential public service providers.
- **Market development and alternative technologies** – Diversion goals cannot be achieved without viable end markets and technological solutions. The LTF will monitor opportunities to support domestic material recovery markets, alternative processing pathways, and circular economy initiatives.

The LTF's Commitment

The LTF remains committed to:

- Ensuring that solid waste and recycling legislation is technically feasible, cost-effective, and grounded in practical experience.
- Advocating for local government authority and reasonable compliance expectations.
- Providing timely and accurate information to SWANA members.
- Collaborating with state agencies and industry partners to advance sustainable, resilient waste management systems.

The continued dedication of LTF members and the active participation of the SWANA Chapters enable the LTF to be a strong, informed voice for California's solid waste industry.

SECTION 2 — Mission of the SWANA California Chapters Legislative Task Force

The mission of the SWANA California Chapters Legislative Task Force (LTF) is to advocate for environmentally responsible, technically feasible, and economically practical solid waste and recycling policies on behalf of the three SWANA California Chapters. The LTF represents local government interests at the Legislature and before state regulatory agencies, providing expert guidance rooted in real-world operational experience.

To carry out this mission, the LTF:

- Monitors legislation and regulatory actions affecting solid waste, recycling, organics management, climate policy, and related sectors.
- Develops and advances positions on bills, regulations, and policy proposals.
- Communicates regularly with SWANA members, legislators, agency staff, and partner organizations.
- Provides technical expertise through comment letters, testimony, fact sheets, and direct engagement.
- Collaborates with other statewide advocacy groups on shared priorities.

The LTF's work ensures that the perspectives and needs of local governments and industry professionals are represented in California's evolving solid waste policy landscape.

SECTION 3 — Introduction

The SWANA California Chapters Legislative Task Force (LTF) serves the Founding, Sierra, and Gold Rush Chapters, collectively representing approximately 1,000 solid waste and recycling professionals statewide. As a 501(c)(4) organization, the LTF advocates for technically feasible, cost-effective, and environmentally sound solid waste policy on behalf of local governments and SWANA members.

California's regulatory and legislative environment continues to evolve quickly, affecting nearly every aspect of material management. The LTF provides essential support by monitoring policy developments, evaluating operational impacts, and communicating priorities to decision-makers. This Work Plan summarizes the LTF's key areas of focus for 2026 and highlights the collective experience and expertise that guide the LTF's advocacy work.

The LTF: Who We Are

SWANA is North America's largest association of solid waste professionals, with more than 10,000 members, including about 1,000 across California. The LTF is composed of Directors appointed by the three California Chapters, reflecting a broad range of operational, regulatory, and policy expertise from local government, joint-powers agencies, and industry organizations.

The LTF contracts with Shaw Yoder Antwih Schmelzer & Lange (SYASL) for legislative and regulatory advocacy services. SYASL provides legislative tracking, bill and regulatory analysis, strategy development, and direct engagement with policymakers. This partnership strengthens the LTF's ability to provide timely, accurate, and credible input on behalf of SWANA members.

What We Do

To ensure that California's solid waste policies remain practical and grounded in operational realities, the LTF:

- Monitors and analyzes legislative and regulatory proposals throughout the year.
- Develops positions on bills and rulemakings that affect local governments and the solid waste sector.
- Prepares and submits comment letters, technical analyses, and testimony.

- Communicates with SWANA members through updates, Chapter meetings, and briefings.
- Hosts annual legislative review and planning meetings to evaluate progress and set priorities.
- Collaborates with other organizations on shared policy interests to strengthen collective advocacy.

These activities culminate in the publication of the annual Legislative & Regulatory Platform and Work Plan. **Attachment A** contains the Legislative Principles that guide the work of the LTF as we review and advocate on legislative and regulatory issues.

National Interests

Although the LTF's focus is state policy, federal actions and national trends often influence California's regulatory framework. SWANA International monitors federal developments and supports coordination among state chapters to align advocacy where appropriate.

The LTF engages with SWANA's Core Advocacy Group and national policy committees when state and federal priorities intersect—such as extended producer responsibility (EPR), methane and air emission policies, circular economy initiatives, and recycling market development. This coordinated approach strengthens the consistency and reach of SWANA's policy positions.

An example of this alignment is SWANA International's adoption of an EPR policy platform, which was informed in part by the longstanding work of the California Chapters. Collaboration across state and national levels helps ensure that solid waste policies are practical, consistent, and grounded in industry experience.

SECTION 4 — 2025 REVIEW & 2026 OUTLOOK

4.1 Overview of 2025 Legislative and Regulatory Engagement

In 2025—the first year of the 2025–2026 Legislative Session—more than **2,400 bills** were introduced, of which approximately **61** had potential impacts on the solid waste and recycling sector and were actively monitored by the LTF. The LTF ultimately took formal positions on **29** bills during the year. Legislative activity was intense, with over **900 bills** sent to the Governor and **11** solid waste and recycling bills signed into law with direct relevance to LTF members and local governments.

The LTF’s legislative engagement in 2025 emphasized technical accuracy, operational feasibility, and safeguarding local government roles. Significant efforts included:

- Supporting bills related to **metal theft, biomethane, PFAS**, and implementation refinements for **SB 1383**, the state’s organic waste diversion mandate.
- Advancing and negotiating technical amendments to bills with potential operational impacts, including **SB 279** (agricultural composting) and **AB 70** (biomethane/pyrolysis definition).
- Dedicating substantial effort to **AB 28**, a two-year bill concerning subsurface elevated temperatures in landfills, which will continue into 2026.

On the regulatory front, the LTF played a central role in reviewing and responding to multiple iterations of the **SB 54 Plastic Pollution Prevention and Packaging Producer Responsibility Act regulations**. These regulations underwent several revisions in late 2024, followed by a complete reset of the rulemaking process in 2025 after the Governor paused the prior draft due to cost concerns.

Throughout 2025, the LTF:

- Submitted extensive comment letters on each version of the SB 54 regulations.
- Advocated for clarity on **alternative collection programs, local jurisdiction compliance, responsible end markets**, and **cost reimbursement**.
- Opposed unworkable elements such as stringent chain-of-custody requirements and jurisdiction-focused enforcement not contemplated in statute.
- Reviewed updated draft regulations released in **May 2025** and the final proposed regulations published on **August 22, 2025**.
- Identified and secured improvements in areas such as enforcement flexibility, responsible end market provisions, and eligibility for corrective action plans.

The LTF also engaged in a broad set of ongoing regulatory actions, including:

- Participation in rule development for the **Landfill Methane Regulation**, which will continue through 2026.
- Tracking CARB programs such as **Advanced Clean Fleets**, **Zero-Emission Forklifts**, and emerging **Tier V off-road engine** standards.
- Monitoring organics-related rulemaking at CalRecycle and tracking implementation adjustments driven by **AB 2902**, **AB 2346**, and **SB 1046** (2024).

Operationally, the LTF held **monthly meetings**, a major **spring legislative review**, multiple **issue-specific subcommittee meetings**, and the in-person **2026 planning meeting** on **November 20–21, 2025**. LTF members provided regular updates at Chapter meetings, maintained the LTF website with current materials, and engaged regularly with legislators, agency staff, and statewide partner organizations.

The breadth and pace of 2025 activity set the foundation for an equally active 2026, with numerous two-year bills, major regulatory packages nearing completion, and ongoing implementation of significant state mandates.

Section 4.2 Issue-Based Review and 2026 Outlook

4.2.1 Single-Use Plastics and SB 54 Implementation

2025 Review

SB 54—the Plastic Pollution Prevention and Packaging Producer Responsibility Act—dominated the LTF’s regulatory engagement in 2025. The rulemaking process underwent multiple revisions in late 2024, followed by a complete restart in 2025 after the Governor paused the prior draft due to cost concerns. New draft regulations were released on **May 16, 2025**, and a second draft of the proposed regulations was published in the **California Regulatory Notice Register** on **August 22, 2025**. The LTF submitted extensive comments on both versions, addressing:

- Ambiguity around “alternative collection” programs
- Local jurisdiction compliance and enforcement concerns
- The need for practical chain-of-custody requirements
- Responsible end markets and impracticability provisions
- The statutory requirement that local jurisdictions be made “financially whole”

Some important improvements were secured, including clearer distinctions between curbside and alternative collection, stronger provisions on responsible end markets, improved exemption/extension processes, and eligibility of jurisdictions to submit corrective action plans. However, concerns remain regarding cost reimbursement timelines and enforcement.

2026 Outlook

Final regulations took effect **May 1, 2026**, marking a transition from rulemaking to implementation. Key 2026 activities include:

- Development and review of Producer Responsibility Plans (by Circular Action Alliance)
- Oversight of SB 54 fee implementation and revenue allocation
- Monitoring and participation in SB 54 Advisory Board proceedings
- Ensuring protection for jurisdictions during the early years of program rollout

LTF Actions

- Engage in implementation discussions following regulation adoption
 - Advocate for full cost reimbursement and reasonable enforcement
 - Participate in development and review of stewardship plans
 - Monitor legislation related to plastics, packaging, or compostable products
-

4.2.2 Organics and SB 1383 Compliance

2025 Review

SB 1383 implementation remained challenging statewide. Jurisdictions continued to face:

- Insufficient organics processing infrastructure
- High program startup and operational costs
- Complex, evolving regulatory guidance
- Procurement and edible food recovery requirements that remain difficult to achieve

Several bills passed in 2024–2025 provided flexibility, including:

- **SB 1046 (2024)** – streamlines development/siting of small and medium compostable material facilities
- **AB 2902 (2024)** – extends rural exemptions to 2037
- **AB 2346 (2024)** – expands procurement options for jurisdictions

2026 Outlook

Key issues will continue into 2026 as jurisdictions work to implement mature programs toward the **2025** diversion and edible food recovery targets. CalRecycle may initiate an update to the SB 1383 regulations to incorporate statutory changes from AB 70, AB 2346, AB 2902 and SB 1046.

LTF Actions

- Advocate for continued state funding for SB 1383 implementation
 - Monitor CalRecycle activities regarding modifications to the SB 1383 regulations
 - Promote procurement flexibility and additional eligible products
 - Support development and deployment of alternative technologies
 - Encourage permit streamlining for new organics processing facilities
 - Continue advocating for RNG produced from organic waste as a circular economy strategy
 - Monitor CalRecycle enforcement and measurement updates
-

4.2.3 Product Stewardship & Extended Producer Responsibility (EPR)

EPR activity continued to intensify across multiple product categories.

Solar Panels

- **AB 864 (2025)** continued efforts from stalled bills (AB 2 and AB 1238).
- Negotiations among CPSC, SEIA, and CalSSA did not produce agreement on a funding mechanism.
- Current version focuses on synchronizing state and federal standards.
- Two-year bill: work continues into 2026.

Carpet

- **AB 863 (2024)** implemented revisions to California's carpet program.
- **AB 80 (2025)** sought further refinements but was held in the Senate Appropriations Committee.
- New legislation expected in 2026.

Household Hazardous Waste (HHW)

- **SB 1143 (2023/2024)** narrowed significantly; ultimately expanded only the PaintCare program.
- **SB 501 (2025)**, a two-year bill, carries forward broader HHW EPR concepts and is expected to be revised in 2026 to focus on certain battery types up to 25 lbs.

Gypsum Wallboard

- Significant operational concerns remain due to sulfate impacts on landfill gas and leachate systems.
- No active legislation; issue requires future policy attention.

Vaping Devices

- **AB 762 (2025)** prohibits sale of single-use vape devices due to fire, battery, and hazardous waste risks.
- **AB 998 (2025)** clarifies classification and management pathways for confiscated vape devices.
- Both are two-year efforts continuing into 2026.

LTF Actions

- Support EPR policies that shift financial/operational burdens away from local governments
 - Monitor developments across multiple product categories
 - Advocate for practical, enforceable EPR frameworks
-

4.2.4 Special Wastes

2025 Review

Several waste streams require specialized handling and present ongoing risks to facilities:

- **EV Batteries:** SB 615 (2023/2024 version vetoed); reintroduced in 2025 but stalled—now a two-year bill.
- **Marine Flares:** SB 1066 (2024) vetoed; **SB 561 (2025)** progressed but became a two-year bill.
- **Compressed Gas Cylinders:** SB 1280 (2024) enacted—bans single-use 1-lb propane cylinders after 2028. Other cylinders (including nitrous oxide) remain problematic.

2026 Outlook

Special wastes remain a priority area due to safety hazards, disposal costs, and the lack of comprehensive, scalable end-of-life programs.

LTF Actions

- Track EV battery and marine flare bills as they carry into 2026
 - Support safe handling, collection, and disposal policies
 - Advocate for solutions that minimize cost impacts to local governments
-

4.2.5 Beverage Container Recycling Program (“Bottle Bill”)

2025 Review

California’s CRV system remains strained due to:

- Outdated subsidy formulas
- Global recycling market disruptions
- Rising operating costs
- Closure of ~50% of CRV centers statewide

Recent expansions include:

- **AB 793 (2020)** recycled content standards (phased through 2030)
- **SB 1013 (2022)** adding wine and liquor
- **SB 353 (2023)** adding large fruit/vegetable containers

CalRecycle awarded **\$70 million** in grants in 2024 to support 37 projects adding more than 250 new recycling sites. The Beverage Container Recycling Grant (BCRG) program offers \$1.5 million per cycle to support market development.

2026 Outlook

Market volatility, operational costs, and program expansion pressures will continue.

LTF Actions

- Support CRV program reform and adequate recycler payments
- Oppose reductions to local government CRV funding

- Support expansion of recycling markets and operator training
 - Identify operational/enforcement challenges for CalRecycle
-

4.2.6 Climate Policy, Clean Fleets, and Air Quality Regulations

2025 Review

State climate and air quality policies significantly impacted the industry:

- **Advanced Clean Fleets (ACF)** — finalized in 2023; major cost and reliability concerns for solid waste fleets.
- **Public Agency Utility exemptions** tied to **AB 1594 (2023)** do *not* include solid waste facilities.
- CARB directed limited relief for fleets using RNG derived from SB 1383 organics diversion.
- **Zero-Emission Forklift Regulation** — effective January 1, 2025, targeting LSI forklifts with reporting and labeling requirements.
- **Tier V off-road engine standards** under development with potential phase-in as early as 2029.
- **Landfill Methane Regulation updates** initiated in late 2025, including stricter leak detection, remote sensing, corrective action, and transparency requirements, with final rule expected in 2026 and implementation in 2027.
- **AB 617 (2017)** emissions data and inventory requirements continue toward the **2029** reporting deadline.

2026 Outlook

Climate and air quality programs will remain among the most resource-intensive engagement areas in 2026 as CARB finalizes multiple rulemakings.

LTF Actions

- Track ACF implementation and document operational impacts
 - Advocate for recognition of RNG as a low-carbon fuel
 - Monitor Tier V engine standards and ZEV requirements
 - Follow LMR rulemaking through final adoption and early implementation
 - Track AB 617 emissions inventory requirements
-

4.2.7 Renewable Natural Gas (RNG) and Organics-Derived Fuels

2025 Review

- RNG remained a critical compliance and market tool for jurisdictions.
- SB 1440 (2018) positions biomethane pipeline injection as a preferred long-term strategy.
- The CPUC's biomethane interconnection process remains cost-prohibitive and slow, limiting project viability.

2026 Outlook

RNG policy will intersect with SB 1383, ACF, and landfill gas management discussions, especially as electrification mandates expand.

LTF Actions

- Monitor CPUC, CARB, and CEC policies affecting RNG projects
 - Support viable RNG pathways for landfills and anaerobic digesters
 - Collaborate with partner organizations on biogas policy development
-

4.2.8 Alternative Technologies

2025 Review

- Alternative technologies remain underutilized due to legislative and regulatory barriers.
- SB 1383 provides a mechanism for CalRecycle to approve alternative technologies for organics, though the process is onerous and only one project has been approved to date.
- SB 54 proposed regulations characterize advanced recycling as hazardous waste management, creating additional hurdles.

2026 Outlook

Post-recycled residuals will continue to require viable recovery pathways.

LTF Actions

- Continue advocating for legislative/regulatory support of alternative technologies
- Promote pathways for difficult-to-recycle materials

- Oppose constraints that eliminate or misclassify advanced technologies
-

4.2.9 PFAS

2025 Review

PFAS concerns accelerated significantly due to:

- 2024 adoption of federal Maximum Contaminant Levels
- CERCLA designation of PFOA and PFOS as hazardous substances
- Increasing focus on PFAS in leachate and landfill gas
- State and regional water board monitoring requirements
- Air emissions research emerging as an important pathway

2026 Outlook

Liability concerns and treatment expectations will expand, with local governments facing increasing compliance pressure.

LTF Actions

- Support legislation reducing PFAS use in consumer products
- Advocate for CERCLA liability protections for passive receivers
- Track PFAS-related regulatory efforts at state and federal levels

4.3 Summary of 2026 Priority Focus Areas

The 2025 legislative and regulatory landscape established a demanding foundation for 2026. With major regulatory packages entering implementation and numerous two-year bills returning for action, the LTF will continue to play a critical role in evaluating proposals, advocating for technical feasibility, and ensuring local government perspectives remain central to policy decisions. The following priority focus areas synthesize the themes, issues, and program needs identified throughout 2025 and carried forward into the coming year.

1. SB 54 Implementation and Plastic Pollution Policy

With SB 54 regulations finalized in 2026 after an unusually complex and iterative rulemaking process, implementation will be the primary focus. This includes evaluating Producer Responsibility Plans, ensuring jurisdictions are “made financially whole,” tracking the rollout

of statutory fees, supporting compliance pathways such as alternative collection, and addressing early challenges in enforcement and market development.

2. SB 1383 Organics Diversion and Infrastructure Development

Jurisdictions continue to face significant challenges in implementation of SB 1383 due to insufficient organics processing capacity, high program costs, complex edible food recovery obligations, and measurement and procurement difficulties. Recent bills—SB 1046 (2024), AB 2902 (2024), and AB 2346 (2024)—offer some relief, but sustained advocacy is needed to improve program feasibility, secure funding, streamline permitting, and promote the use of alternative technologies and RNG derived from organic waste.

3. Extended Producer Responsibility (EPR) Expansion

Multiple material streams will remain active in the EPR space in 2026, including solar panels (AB 864), carpet (successor to AB 80), HHW/batteries (SB 501), vaping devices (AB 762 and AB 998), and potentially other hard-to-manage products such as gypsum wallboard and compressed gas cylinders. These categories vary in maturity, but all require producer-funded, practical systems that do not burden local governments.

4. Special Wastes Management

EV batteries, marine flares, compressed gas cylinders, and other hazardous or high-risk products will continue to pose challenges. Several of these items are the subject of two-year bills returning in 2026. Safe end-of-life management and cost-effective collection remain high priorities for jurisdictions.

5. Beverage Container Recycling System Stability

California's CRV system continues to experience volatility due to outdated formulas, market disruptions, program expansions, and widespread closure of redemption centers. CalRecycle investments (including ~\$70 million in grants for ~250 new sites) and ongoing BCRG cycles offer partial relief, but structural reforms remain essential. The LTF will monitor funding, enforcement, and performance of expanded program elements in 2026.

6. Climate Policy and Air Quality Regulations

Several major CARB initiatives—Advanced Clean Fleets, Zero-Emission Forklifts, Tier V off-road engine standards, updated Landfill Methane Regulation (expected finalization in 2026), and AB 617 emissions inventory requirements—will require detailed review and

sustained advocacy. Mandatory fleet electrification requirements in particular pose significant operational and financial challenges to essential solid waste services.

7. Renewable Natural Gas and Landfill Gas Policy

RNG remains a critical compliance and fuel pathway for fleets transitioning under SB 1383 organic diversion mandates. However, CPUC interconnection costs and electrification-oriented policy directions threaten the viability of landfill gas-to-energy and digester-based RNG projects. Continued advocacy is needed to preserve RNG as a low-carbon fuel option and maintain programmatic alignment across agencies.

8. Alternative and Emerging Technologies

The State's limited support for alternative technologies—despite SB 1383's allowance for approval—continues to constrain recycling and organics diversion options. Misclassification of processes under proposed SB 54 regulations, combined with burdensome approval criteria, limits innovation. In 2026, the LTF will continue advocating for regulatory pathways that support the recovery of post-recycled residuals and difficult-to-process materials.

9. PFAS Management and Liability Protections

PFAS regulation will remain a high-urgency issue in 2026, with federal MCLs, CERCLA hazardous substance designations, and ongoing state agency actions (SWRCB, Regional Boards, DTSC, CalRecycle, CARB). Landfills are passive receivers of PFAS yet face increasing liability risks and treatment expectations. Advocacy at both state and federal levels is essential to ensure defensible frameworks and avoid disproportionate burdens on local governments.

Conclusion of Section 4.3

These priorities reflect the most significant themes emerging from the LTF's 2025 work and establish a clear foundation for strategic engagement in 2026. Each issue will require ongoing monitoring, detailed analysis, and collaborative advocacy to ensure that California's solid waste and recycling policies remain operationally feasible and environmentally sound.

SECTION 5 — 2026 WORK PLAN

5.1 Communications, Outreach, and Education

Effective communication is essential to ensuring that California’s solid waste professionals remain informed, engaged, and equipped to navigate ongoing legislative and regulatory changes. In 2026, the LTF will continue to strengthen communication channels with SWANA Chapters, policymakers, and partner organizations. The LTF’s communication strategy focuses on accessibility, transparency, and responsiveness.

Objectives

The LTF’s communications objectives for 2026 include:

- Increasing member awareness of emerging legislative and regulatory issues.
- Providing timely updates that enable Chapters to communicate effectively with their members.
- Supporting LTF advocacy through coordinated, accurate information-sharing.
- Strengthening relationships with state agencies, legislators, and partner organizations to elevate local government priorities.

Key Communication Activities

The LTF will achieve these objectives through the following activities, each derived from current practices and commitments documented in the original Work Plan:

1. Email Updates (Three Times Per Year)

The LTF will issue email updates to SWANA Chapter members at three key points during the legislative cycle. These updates will highlight “spotlight bills,” regulatory developments, major deadlines, and end-of-year summaries.

2. Chapter Engagement and Meeting Reports

LTF representatives will attend Chapter Board and membership meetings to provide verbal updates, answer questions, and gather feedback from local governments. Written updates will be provided at major milestones such as bill introduction deadlines, committee hearings, and the end of the legislative year.

3. Website Maintenance and Resource Posting

The LTF will continue updating and maintaining its website (swanacal-leg.org), ensuring that meeting summaries, bill matrices, fact sheets, comment letters, and the Work Plan remain

accessible to members. In 2026, the LTF is planning to upgrade the website to create a modern look and make it easier to use. Additionally, the LTF will transition away from Facebook and will explore the use of LinkedIn as another platform for outreach and engagement.

4. Relationship-Building and Government Engagement

The LTF will continue fostering constructive relationships with key legislative offices, committee consultants, agency leadership, and staff in the Governor's Office, CalRecycle, CARB, DTSC, SWRCB, and CPUC. These relationships are essential for clarifying technical issues, explaining local government impacts, and advocating feasible timelines and requirements.

5. Collaboration with Partner Organizations

The LTF will participate in meetings and joint advocacy efforts with organizations such as the CPSC, CalCities, CSAC, RCRC, Resource Recovery Coalition of California, Solid Waste Industry Group, and others. This collaboration strengthens the LTF's influence and allows aligned messages to be shared widely.

5.1 Summary

Through these communication and outreach activities, the LTF will maintain a clear, professional, and proactive presence on behalf of SWANA members. The aim is to ensure that technical and policy challenges are communicated early, accurately, and effectively, supporting both local implementation efforts and statewide advocacy goals.

5.2 Tracking Legislative and Regulatory Developments

The LTF will continue systematic monitoring of state and federal legislative activity, regulatory updates, and agency guidance that affect solid waste, materials management, and recycling system operations. The purpose of this work is to ensure members remain informed and able to respond to emerging issues in a timely manner.

- Monitor proposed bills, budget actions, rulemakings, and policy updates relevant to solid waste and recycling systems.
- Provide timely briefings to the LTF at meetings and through interim updates.
- Identify operational and fiscal implications for local programs.
- Coordinate with partner organizations as needed.
- Support development of LTF comment letters and analyses.

5.3 Development of LTF Work Products

The LTF will continue preparing focused work products that support member decision-making and provide clear, informed summaries and analysis on policy and regulatory issues. This may include comment letters, analyses of proposed legislation or rules, or other materials needed to clarify potential operational or fiscal impacts.

The LTF will update these work products as needed to reflect new legislative outcomes, agency guidance, or emerging program requirements.

5.4 Meeting Planning and Administration

The LTF will support effective meeting planning and administration to ensure members have the information and structure needed for productive discussions. Activities include preparing agendas, distributing meeting materials in a timely manner, and maintaining clear records of decisions and action items. The LTF will also schedule additional meetings of subcommittees as needed to address complex legislation or regulations. Additionally, the LTF Officers will complete actions needed to implement the organization's new non-profit status, including any agreements needed with the California Chapters and SWANA International.

Section 6. Communication and Member Engagement

The LTF will support clear, consistent communication to the Chapters to ensure timely awareness of policy developments, work plan priorities, and meeting outcomes.

- Circulating meeting summaries and materials in a timely manner.
- Sharing three updates per year highlighting high-priority legislative or regulatory developments that may be of interest to members.
- Updating the LTF website to make it easier for Members to use.

Section 7. Annual Reporting and Documentation

The LTF will prepare and maintain documentation that supports transparency and continuity for its annual activities. This includes summarizing major actions taken throughout the year, noting significant legislative or regulatory developments monitored by the LTF, and documenting progress toward the objectives outlined in the annual work plan.

- Preparing an annual summary of LTF meetings, work products, and key actions.
- Documenting the status of work plan tasks and identifying any carryover items.
- Completing any required reports or documentation related to the LTF's new non-profit status or requested by the California Chapters or SWANA International.

APPENDIX A – LTF ADVOCACY PRINCIPLES

Advocacy Principles

The LTF's policy positions on legislation and regulation are based on the following principles:

- **Local Control:** Support local government control of solid waste policy, operations, and program implementation and oppose preemption of local authority or discretion. Promote legislation that provides opportunities for local government stakeholder participation in regulatory and policy matters.
- **Infrastructure and Diversion Funding:** Support new or additional State funding for expanded recycling and organics processing needed to implement state laws and regulations; specifically support funding for local jurisdictions for state mandated programs and activities.
- **Circular Economy:** Support programs that advance a circular economy, such as repairability/reuse; improved design to reduce product packaging, content, and toxicity; and EPR (Extended Producer Responsibility).
- **CalRecycle Review of Local Programs:** Advocate for transparency, consistency, and consideration of reasonable and realistic “best efforts” in CalRecycle’s review of local jurisdiction implementation of mandated programs (e.g. Integrated Waste Management Plans under AB 939 and organic waste diversion programs under AB 1594 and SB 1383).
- **Engagement:** Advocate for local government involvement in the development of policies and regulations.
- **Due Process:** Support regulatory frameworks that provide the regulated community with independent due process in State agency enforcement proceedings.
- **Extended Producer Responsibility (EPR):** Support EPR and product stewardship legislation that shifts the financial burden of managing hazardous and difficult-to-handle products from local government to the producers of those products.
- **Landfill Bans:** Only support landfill bans when an appropriately funded alternative method of handling the material (e.g. EPR) has been put in place. Oppose landfill bans that are not substantiated by scientific studies showing that landfilling the material poses a danger to human or environmental health.
- **Organics Management:** Support diversion of recyclables and organics from landfills through cost-effective organics management programs and infrastructure that best fits each jurisdiction’s demographics, waste characteristics, and facility availability. Support legislation and regulation that is cost effective and practical to implement. Oppose state mandates that are infeasible and do not provide a funding source.
- **Beverage Container Recycling Program ("Bottle bill"):** Support efforts that improve the Bottle Bill and increase access to recycling centers.
- **Hazardous Waste / Toxic Reduction:** Support efforts to reduce household hazardous waste (HHW) and toxic chemicals released in the environment and that impact worker health. Support EPR for management of these materials. Support legislation to reduce the use of toxic chemicals in products and that protects municipal landfills from

liability, especially for chemicals such as per- and polyfluoroalkyl substances (PFAS).

- **State Agency Compliance:** Advocate that state facilities be required to comply with all solid waste management and diversion requirements, or for local jurisdictions to be granted exemptions or allowances when state agencies within their boundaries are not complying with state mandates (e.g. prisons, school districts).
- **Siting/Expanding Facilities:** Advocate for permit streamlining.
- **Recyclables Market Development:** Support the development of domestic markets for recovered materials, including organics, plastics, and packaging; support increased recycled content requirements for specific products. Support the development of tax incentives, low interest loans, and a sales and use tax exemption for investments in recycling infrastructure. Oppose enforcement on local jurisdictions and recyclers when markets do not exist.
- **Emerging and Alternative Technologies:** Where landfilling is the only option, support alternative technologies and advocate for legislation that removes barriers and provides incentives that help develop alternative technology projects. Oppose efforts that would thwart the development of alternative technology projects.
- **Health and Safety:** Support health and safety in the solid waste industry, for instance, by promoting the safe handling and management of batteries and other hazardous materials.

APPENDIX B – ACRONYM LIST

AB – Assembly Bill
ACF – Advanced Clean Fleets
ADC – Alternative Daily Cover
BCRG – Beverage Container Recycling Grant
CalCities – League of California Cities
CalSSA -- California Solar Storage Association
CalRecycle – Department of Resources Recycling and Recovery
CSAC – California State Association of Counties
C&D – Construction and Demolition
CARB – California Air Resources Board
CEC – California Energy Commission
CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act
CNG – Compressed Natural Gas
CPUC – California Public Utilities Commission
CPSC – California Product Stewardship Council
CRV – California Redemption Value
DTSC – Department of Toxic Substances Control
EPR – Extended Producer Responsibility
EPA – United States Environmental Protection Agency
EV – Electric Vehicle
HHW – Household Hazardous Waste
LFG – Landfill Gas
LMR – Landfill Methane Rule
LSI – Large Spark-Ignited
LTF – Legislative Task Force
MCR – Mandatory Commercial Recycling
MFD – Multi-Family Dwellings
PFAS – Per- and Polyfluoroalkyl Substances
PFOA – Perfluorooctanoic Acid
PFOS – Perfluorooctane Sulfonate
PRC – Public Resources Code
PRO – Producer Responsibility Organization
PV – Photovoltaic
RCRA – Resource Conservation and Recovery Act
RCRC – Rural County Representatives of California
RNG – Renewable Natural Gas
SB – Senate Bill
SEIA – Solar Energy Industries Association
SWANA – Solid Waste Association of North America
SWRCB – State Water Resources Control Board
SYASL – Shaw Yoder Antwih Schmelzer & Lange
ZEV – Zero-Emission Vehicle



Chair Curtis Larkin, *Fresno County*
Vice Chair Sharon Green, *LACSD*
Treasurer Frank Caponi, *Retired*
Secretary Deepti Jain, *City of Sunnyvale*

SWANA Legislative Task Force 2025 Bill Positions

- SWANA LTF took positions on 29 bills and tracked 61 total in 2025.
 - [AB 28 \(Schiavo\) Solid waste landfills: subsurface temperatures.](#)
 - LTF Position: Opposed unless amended
 - LTF Action: SWANA LTF drafted letter and proposed amendments
 - Result: 2-year bill, Sen. Floor
 - [AB 70 \(Aguiar-Curry\) Solid waste: organic waste: diversion: biomethane.](#)
 - LTF Position: Support
 - LTF Action: SWANA LTF drafted letter
 - Result: Signed by Governor
 - [AB 80 \(Aguiar-Curry\) Carpet recycling.](#)
 - LTF Position: Support
 - LTF Action: Joined coalition letter
 - Result: 2-year bill, Sen. Approps
 - [AB 337 \(Bennett\) Greenhouse Gas Reduction Fund: grant program: edible food.](#)
 - LTF Position: Support
 - LTF Action: SWANA LTF drafted letter
 - Result: 2-year, Asm. Approps
 - [AB 436 \(Ransom\) Composting facilities: zoning.](#)
 - LTF Position: Support
 - LTF Action: Lobbied legislators and staff
 - Result: 2-year, Asm. Approps
 - [AB 476 \(González\) Metal Theft.](#)
 - LTF Position: Support
 - LTF Action: SWANA LTF drafted letter
 - Result: Signed by Governor
 - [AB 762 \(Irwin\) Disposable, battery-embedded vapor inhalation device: prohibition.](#)
 - LTF Position: Support
 - LTF Action: Joined coalition letter, lobbied legislators and staff
 - Result: 2-year bill, Asm. B&P
 - [AB 914 \(Garcia\) Air pollution: indirect sources: toxic air contaminants.](#)
 - LTF Position: Oppose
 - LTF Action: Joined coalition letter
 - Result: 2-year bill, Asm. Approps
 - [AB 973 \(Hoover\) Recycling: plastic packaging and products.](#)
 - LTF Position: Support
 - LTF Action: Lobbied legislators and staff
 - Result: 2-year, Asm. Approps
 - [AB 998 \(Hadwick\) Household hazardous waste.](#)

LEGISLATIVE ADVOCATE

Dylan Hoffman

Shaw Yoder Antwih Schmelzer & Lange • 1415 L Street, Suite 1000, Sacramento, CA 95814 • (916) 446-4656 • Fax (916) 446-4318

- LTF Position: Support
- LTF Action: Joined coalition letter
- Result: 2-year, Sen. Approps
- [AB 1394 \(Wallis\) Personal opioid drug deactivation and disposal systems.](#)
 - LTF Position: Oppose
 - LTF Action: Joined coalition letter
 - Result: 2-year bill, Asm. Health
- [SB 45 \(Padilla\) Recycling: beverage containers: tethered plastic caps.](#)
 - LTF Position: Support
 - LTF Action: Joined coalition letter
 - Result: 2-year, Sen. Approps
- [SB 88 \(Caballero\) Air resources: carbon emissions: biomass.](#)
 - LTF Position: Support
 - LTF Action: Joined coalition letter
 - Result: Vetoed by Governor
- [SB 279 \(McNerney\) Solid waste: compostable materials.](#)
 - LTF Position: Oppose unless amended,
 - LTF Action: SWANA LTF drafted letter and proposed amendments
 - Result: Signed by Governor
- [SB 318 \(Becker\) Air pollution: stationary sources: best available control technology](#)
 - LTF Position: Oppose
 - LTF Action: Joined coalition letter
 - Result: 2-year, Sen. Approps
- [SB 501 \(Allen\) Household Hazardous Waste Producer Responsibility Act.](#)
 - LTF Position: Support
 - LTF Action: Joined coalition letter
 - Result: 2-year, Sen. Approps
- [SB 561 \(Blakespear\) Hazardous waste: Emergency Distress Flare Safe Disposal Act.](#)
 - LTF Position: Support
 - LTF Action: Joined coalition letter
 - Result: 2-year, Asm. Environmental Safety and Toxic Materials
- [SB 594 \(Padilla\) Waste discharge permits: landfills.](#)
 - LTF Position: Oppose
 - LTF Action: SWANA LTF drafted letter
 - Result: 2-year, Asm. Environmental Safety and Toxic Materials
- [SB 682 \(Allen\) Environmental health: product safety: perfluoroalkyl and polyfluoroalkyl substances.](#)
 - LTF Position: Support
 - LTF Action: Joined coalition letter
 - Result: Vetoed by Governor